

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CUTBERTO VIRAMONTES, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	No. 21 CV 4595
	)	
v.	)	Judge Rebecca R. Pallmeyer
	)	Magistrate Judge Susan E. Cox
THE COUNTY OF COOK, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**AGREED MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER**

NOW COME the Plaintiffs, Cutberto Viramontes, Christopher Khaya, Second Amendment Foundation, and Firearms Policy Coalition, Inc., by and through their attorney, William V. Bergstrom, of Cooper & Kirk PLLC, and the Defendants, the County of Cook, Toni Preckwinkle in her official capacity, Kimberly M. Foxx in her official capacity, and Thomas Dart in his official capacity, by and through their attorney, Edward M. Brener, of the Cook County State’s Attorney’s Office, and jointly move for the entry of the attached Agreed Confidentiality Order. In support thereof, the parties state as follows:

1. This lawsuit challenges the constitutionality of the “Blair Holt Assault Weapons Ban”, a Cook County, Illinois ordinance.
2. Defendants submit that they anticipate producing documents and files that may be categorized as confidential under the Model Confidentiality Order. Plaintiffs have not seen the documents in question and reserve the right to challenge any confidentiality designation under the terms of the proposed Order.
3. Counsel for both parties have reviewed the Proposed Agreed Confidentiality Order, based off The U.S. District Court for the Northern District of Illinois’ Model Confidentiality Order under Local Rule 26.2.

4. Counsel for parties have conferred and agree that entry of a confidentiality order would be appropriate in this action.
5. Pursuant to this Court's standing order, the proposed order will be submitted via electronic mail, red-lined changes visible, for the Court's approval.

WHEREFORE, the Parties respectfully request that this Court enter the submitted Agreed Confidentiality Order to govern all disclosures where appropriate.

**s/David H. Thompson**

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**qs/Edward M. Brener**

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